

U. S. DISTRICT COURT
N.D. OF N.Y.
FILED

JUN 16 2000

LAWRENCE K. BAERMAN, CLERK
ALBANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

PEDRO GONZALEZ,
EULER DeJESUS SOTO-GALLO,
GABRIEL LNU,
PATRICIA BECERRA-PINZON,
MARGARITA HERRERA-OSPINAS,
SANDRA E. GALLON-CARDONA,
ANASTASIO CIRINO SOSA-GUZMAN,
CESAR AUGUSTO GUZMAN-RAMIREZ,
HILDÁ MERCEDES CALLE-VERGARA,
OCTAVIO DeJESUS VILLA-CASTANO,
SANDY YURLEY RODRIGUEZ-CORTEZ,
LAUREANO HERNAN LASSO-GARCIA,
BLANCA ALICIA PINTO-OSORIO,
ALFREDO ALBENIS GOMEZ-PINTO,
a/k/a Javier,
INES CECILIA GUZMAN-RAMIREZ,
JOSE ANTONIO ESPEJO-LARA,
JUAN C. ALVA-FLORES,
GLORIA NELLY ESCOBAR-RIOS,
LUIS NORBERTO GOMEZ-RAMIREZ,
ROBERTO GOMEZ-PIEDRAHITA,
NAYID ENSUENO SOTO-GALLO,
SERGIO ALBERTO GALLEGO-VASQUEZ
WILFRIDO WALTER VALENCIA-VELEZ,
ASCENSION GOMEZ-deAMAYA,
JOHN JAIRO CEBALLOS-MEJIA,
MIGUEL PABLO MILLAN-CASTILLO,
PABLO DEAN VILLA,
BEATRIZ RIAL-IGLESIAS,
LUIS SAMPEDRO-MARTINEZ,
DIANA M. LIJO-GARCIA,

INDICTMENT

1:
Crim. No. 00-CR-304
J.M.

VIO: 8 USC §§ 1324; 1325; 1326;
18 USC §§ 201(b)(1)(A); 371;
21 USC §§ 841(a)(1); 846

FORFEITURE ALLEGATIONS

[34 Counts]

MEE JIN-KIM,
JUAN RODRIGUEZ-FERNANDEZ,
JOSE SANDE GONZALEZ,
AIDA AZUCENA NINO-TELLEZ,
IVANIA MARIA COUTO,
ARACELIS MUÑOZ-SALDANA,
LUIS FERNANDO YEPES-QUINTERO,
a/k/a Joaquin Emilio Munoz-Munoz, and
OSCAR MAURICIO RAMIREZ-JARAMILLO
a/k/a Daniel Gonzalez-Sierra,

Defendants.

**CONSPIRACY TO DISTRIBUTE AND TO POSSESS WITH INTENT
TO DISTRIBUTE A CONTROLLED SUBSTANCE**

COUNT 1

THE GRAND JURY CHARGES:

That beginning in or about June 24, 1999, and continuing thereafter up to and including on or about the date of this indictment, at or near a location in the State and Northern District of New York, and elsewhere,

**PEDRO GONZALEZ
EULER DeJESUS SOTO-GALLO,
CESAR AUGUSTO GUZMAN-RAMIREZ, and
GABRIEL LNU**

the defendants herein, and others, did knowingly and intentionally combine, conspire, confederate, and agree to distribute and to possess with intent to distribute cocaine, a Schedule II controlled substance, and heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

The amount of cocaine involved in the conspiracy exceeded five (5) kilograms.

The amount of heroin involved in the conspiracy exceeded one (1) kilogram.

In violation of Title 21, United States Code, Section 846.

**POSSESSION WITH INTENT TO DISTRIBUTE AND DISTRIBUTION OF
CONTROLLED SUBSTANCES**

COUNTS 2 - 7

THE GRAND JURY FURTHER CHARGES:

That on or about the dates set forth below, at or near the locations set forth below, in the State and Northern District of New York, the defendants named below did knowingly and intentionally possess with intent to distribute and distribute cocaine, a Schedule II controlled substance, and heroin, a Schedule I controlled substance, each instance listed below constituting a separate Count of this Indictment.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT 2

DEFENDANT(S) : **PEDRO GONZALEZ and
CESAR AUGUSTO GUZMAN-RAMIREZ**

DATE : August 11, 1999

LOCATION : Fox Run Restaurant / Best Western, New Baltimore, NY

CONTROLLED
SUBSTANCE : Approximately 125 grams of cocaine.

COUNT 3

DEFENDANT(S) : **PEDRO GONZALEZ**

DATE : August 16, 1999

LOCATION : Fox Run Restaurant / Best Western, New Baltimore, NY

CONTROLLED
SUBSTANCE : Approximately 99 grams of heroin.

COUNT 4

DEFENDANT(S) : **PEDRO GONZALEZ and
CESAR AUGUSTO GUZMAN-RAMIREZ**

DATE : October 6, 1999

LOCATION : Fox Run Restaurant / Best Western, New Baltimore, NY

CONTROLLED
SUBSTANCE : Approximately 250 grams of heroin.

COUNT 5

DEFENDANT(S) : **PEDRO GONZALEZ,
EULER DeJESUS SOTO-GALLO**

DATE : October 15, 1999

LOCATION : Fox Run Restaurant / Best Western, New Baltimore, NY

CONTROLLED
SUBSTANCE : Approximately 544 grams of heroin.

COUNT 6

DEFENDANT(S) : **PEDRO GONZALEZ**

DATE : February 14, 2000

LOCATION : Kingston Family Restaurant, Ulster, NY

CONTROLLED
SUBSTANCE : Approximately 445 grams of heroin.

COUNT 7

DEFENDANT(S) : **PEDRO GONZALEZ**

DATE : March 22, 2000

LOCATION : Fox Run Restaurant / Best Western, New Baltimore, NY

CONTROLLED SUBSTANCE : Approximately one (1) kilogram of heroin

COUNT 8

THE GRAND JURY FURTHER CHARGES:

That from on or about June 24, 1999, up to and including the date of the filing of this Indictment, in Counties of Greene, Otsego, Ulster and Broome, all within the State and Northern District of New York, and elsewhere,

**PEDRO GONZALEZ,
EULER DeJESUS SOTO-GALLO,
GABRIEL LNU,
PATRICIA BECERRA-PINZON,
MARGARITA HERRERA-OSPINA,
SANDRA E. GALLON-CARDONA,
ANASTASIO CIRINO SOSA-GUZMAN,
CESAR AUGUSTO GUZMAN-RAMIREZ,
HILDA MERCEDES CALLE-VERGARA
OCTAVIO DeJESUS VILLA-CASTANO,
SANDY YURLEY RODRIGUEZ-CORTEZ,
LAUREANO HERNAN LASSO-GARCIA,
BLANCA ALICIA PINTO-OSORIO,
ALFREDO ALBENIS GOMEZ-PINTO,
a/k/a Javier,
INES CECILIA GUZMAN-RAMIREZ,
JOSE ANTONIO ESPEJO-LARA,
JUAN C. ALVA-FLORES,
GLORIA NELLY ESCOBAR-RIOS,
LUIS NORBERTO GOMEZ-RAMIREZ,
ROBERTO GOMEZ-PIEDRAHITA,**

**NAYID ENSUENO SOTO-GALLO,
SERGIO ALBERTO GALLEGO-VASQUEZ
WILFRIDO WALTER VALENCIA-VELEZ,
ASCENSION GOMEZ-deAMAYA,
JOHN JAIRO CEBALLOS-MEJIA,
MIGUEL PABLO MILLAN-CASTILLO,
PABLO DEAN VILLA,
BEATRIZ RIAL-IGLESIAS,
LUIS SAMPEDRO-MARTINEZ,
DIANA M. LIJO-GARCIA,
MEE JIN-KIM,
JUAN RODRIGUEZ-FERNANDEZ,
JOSE SANDE GONZALEZ,
AIDA AZUCENA NINO-TELLEZ,
IVANIA MARIA COUTO,
ARACELIS MUÑOZ-SALDANA,
LUIS FERNANDO YEPES-QUINTERO,
a/k/a Joaquin Emilio Munoz-Munoz,
OSCAR MAURICIO RAMIREZ-JARAMILLO**

and others, did knowingly and intentionally combine, conspire, confederate, and agree to directly and indirectly corruptly give, offer and promise things of value to an employee of the United States Department of Justice, Immigration and Naturalization Service (INS), a public official, with the intent to influence an official act, that is the classification of an alien by the INS as a Permanent Resident Alien when that alien was not entitled to such status.

In violation of Title 18, United States Code, Section 201(b)(1)(A)

OVERT ACTS

In furtherance of such agreement, combination and conspiracy, and to effect the objects thereof, the defendants, and their co-conspirators, committed the following overt acts, among others, in the Northern District of New York, and elsewhere, by promising or paying a thing of

value to an INS official in exchange for processing by the INS for INS Form I-551's or "Green Cards":

Overt Act

DEFENDANT(S) : **PEDRO GONZALEZ,**
PATRICIA BECERRA-PINZON, (processed)
MARGARITA HERRERA-OSPIÑA (processed)

DATE : June 24, 1999

LOCATION : Neptune Diner / Super 8 Motel, Oneonta, NY

THING OF VALUE : Drugs promised

Overt Act

DEFENDANT(S) : **PEDRO GONZALEZ,**
SANDRA E. GALLON-CARDONA (processed)
ANASTASIO CIRINO SOSA-GUZMAN (processed)

DATE : July 15, 1999

LOCATION : Fox Run Restaurant / Best Western, New Baltimore, NY

THING OF VALUE : Drugs promised

Overt Act

DEFENDANT(S) : **PEDRO GONZALEZ,**
HILDA MERCEDES CALLE-VERGARA, (processed)
CESAR AUGUSTO GUZMAN-RAMIREZ, (processed)
OCTAVIO DeJESUS VILLA-CASTANO, (processed)
SANDY YURLEY RODRIGUEZ-CORTEZ, (processed)
LAUREANO HERNAN LASSO-GARCIA (processed)

DATE : August 11, 1999

LOCATION : Fox Run Restaurant / Best Western, New Baltimore, NY

THING OF VALUE : Approximately 125 grams of cocaine

Overt Act

DEFENDANT(S) : **PEDRO GONZALEZ,**
BLANCA ALICIA PINTO-OSORIO, (processed)
ALFREDO ALENIS GOMEZ-PINTO, (processed)
EULER DeJESUS SOTO-GALLO (processed)
PATRICIA BECERRA-PINZON (issued I-551)
MARGARITA HERRERA-OSPINAS (issued I-551)

DATE : August 16, 1999

LOCATION : Fox Run Restaurant / Best Western, New Baltimore, NY

THING OF VALUE : Approximately 99 grams of heroin delivered.

Overt Act

DEFENDANT(S) : **PEDRO GONZALEZ,**
BLANCA ALICIA PINTO-OSORIO, (issued I-551)
EULER DeJESUS SOTO-GALLO (issued I-551)
a/k/a **Fantasma**
CESAR AUGUSTO GUZMAN-RAMIREZ (issued I-551)
OCTAVIO DeJESUS VILLA-CASTANO (issued I-551)

DATE : October 6, 1999

LOCATION : Fox Run Restaurant / Best Western, New Baltimore, NY

THING OF VALUE : Approximately 250 grams of heroin delivered.

Overt Act

DEFENDANT(S) : **PEDRO GONZALEZ,**
INES CECILIA GUZMAN-RAMIREZ, (processed)
JOSE A. ESPEJO-LARA, (processed)
JUAN CARLOS ALVA-FLORES (processed) and
GLORIA NELLY ESCOBAR-RIOS (processed)

DATE : October 8, 1999

LOCATION : Fox Run Restaurant / Best Western, New Baltimore, NY

THING OF VALUE : Heroin promised

Overt Act

DEFENDANT(S) : **PEDRO GONZALEZ,**
ALFREDO ALBENIS GOMEZ-PINTO
a/k/a Javier (issued I-551)
SANDRA GALLON-CARDONA (issued I-551)

DATE : October 15, 1999

LOCATION : Fox Run Restaurant / Best Western, New Baltimore, NY

THING OF VALUE : Approximately 544 grams of Heroin and .24 grams of marijuana delivered.

Overt Act

DEFENDANT(S) : **PEDRO GONZALEZ,**
LUIS NORBERTO GOMEZ-RAMIREZ, (processed)
ROBERTO GOMEZ-PIEDRAHITA (processed) and
NAYID ENSUENO SOTO-GALLO (processed)

DATE : October 27, 1999

LOCATION : Christie's Grille / Best Western, Johnson City, NY

THING OF VALUE : Heroin promised.

Overt Act

DEFENDANT(S) : **PEDRO GONZALEZ,**
SERGIO ALBERTO GALLEGOS-VASQUEZ (processed)
WILFRIDO WALTER VALENCIA-VELEZ (processed)
ANASTASIO CIRINO SOSA-GUZMAN (issued I-551)

DATE : December 14, 1999

LOCATION : Ruby Tuesday Restaurant / Best Western, Johnson City, NY

THING OF VALUE : Heroin promised.

Overt Act

DEFENDANT(S) : **PEDRO GONZALEZ**

DATE : February 14, 2000

LOCATION : Kingston Family Restaurant / Best Western, Ulster, NY

THING OF VALUE : Approximately 445 grams of Heroin delivered.

Overt Act

DEFENDANT(S) : **PEDRO GONZALEZ**
ASCENSION GOMEZ-deAMAYA, (processed)
JOHN JAIRO CEBELLOS-MEJIA, (processed)
MIGUEL PABLO MILLAN-CASTILLO (processed)
PABLO DEAN VILLA (processed) and
GLORIA NELLY ESCOBAR-RIOS (issued I-551; card contained error; defendant did not accept until rectified)

DATE : February 25, 2000

LOCATION : Sharon's Place / Best Western, New Baltimore, NY

THING OF VALUE : Heroin promised

Overt Act

DEFENDANT(S) : **PEDRO GONZALEZ**,
BEATRIZ RIAL-IGLESIAS, (processed)
LUIS SAMPEDRO-MARTINEZ, (processed)
DIANA M. LIJO-GARCIA, (processed)
MEE JIN KIM, (processed)
JUAN RODRIGUEZ-FERNANDEZ, (processed) and
JOSE SANDE GONZALEZ, (processed)

DATE : March 22, 2000

LOCATION : Fox Run Restaurant / Best Western, New Baltimore, NY

THING OF VALUE : Approximately one (1) kilogram of heroin delivered.

Overt Act

DEFENDANT(S) : **PEDRO GONZALEZ**
JUAN C. ALVA-FLORES (issued I-551) and
WILFRIDO WALTER VALENCIA-VELEZ (issued I-551)

DATE : April 7, 2000

LOCATION : Sharon's Place Restaurant / Best Western, New Baltimore, NY

THING OF VALUE : Heroin delivered on March 22, 2000.

Overt Act

DEFENDANT(S) : **PEDRO GONZALEZ,**
AIDA AZUCENA NINO-TELLEZ, (processed),
IVANIA MARIA COUTO (processed),
ARACELIS MUÑOZ-SALDANA, (processed)
LUIS FERNANDO-YEPES-QUINTERO (processed)
a/k/a **Joaquin Emilio Munoz-Munoz**
OSCAR MAURICIO RAMIREZ-JARAMILLO (processed)
a/k/a **Daniel Alberto Gonzalez-Sierra**

DATE : May 19, 2000

LOCATION : Fox Run Restaurant / Best Western, New Baltimore, NY

THING OF VALUE : Heroin promised

All in violation of Title 18, United States Code, Section 371.

BRIBERY

COUNTS 9 - 18

THE GRAND JURY FURTHER CHARGES:

That on or about the dates set forth below, at or near the locations set forth below, in the state and Northern District of New York, the defendants listed below, directly and indirectly did corruptly give, offer and promise a thing of value as set forth below, to an employee of the United States Department of Justice, Immigration and Naturalization Service (INS), a public official, with the intent to influence an official act, that is the classification of an alien by the INS as a Permanent Resident Alien, when that alien was not entitled to such status. Each instance listed constituting a separate Count.

All in violation of Title 18, United States Code, Section 201(b)(1)(A) and Section 2.

COUNT 9

DEFENDANT(S) : **PEDRO GONZALEZ,**
PATRICIA BECERRA-PINZON, (processed)
MARGARITA HERRERA-OSPINA (processed)

DATE : June 24, 1999

LOCATION : Neptune Diner / Super 8 Motel, Oneonta, NY

THING OF VALUE : Drugs promised

COUNT 10

DEFENDANT(S) : **PEDRO GONZALEZ,**
SANDRA E. GALLON-CARDONA (processed)
ANASTASIO CIRINO SOSA-GUZMAN (processed)

DATE : July 15, 1999

LOCATION : Fox Run Restaurant / Best Western, New Baltimore, NY

THING OF VALUE : Drugs promised

COUNT 11

DEFENDANT(S) : **PEDRO GONZALEZ,**
HILDA MERCEDES CALLE-VERGARA, (processed)
CESAR AUGUSTO GUZMAN-RAMIREZ, (processed)
OCTAVIO DeJESUS VILLA-CASTANO, (processed)
SANDY YURLEY RODRIGUEZ-CORTEZ, (processed)
LAUREANO HERNAN LASSO-GARCIA (processed)

DATE : August 11, 1999

LOCATION : Fox Run Restaurant / Best Western, New Baltimore, NY

THING OF VALUE : Approximately 125 grams of cocaine

COUNT 12

DEFENDANT(S) : **PEDRO GONZALEZ,**
BLANCA ALICIA PINTO-OSORIO, (processed)
ALFREDO ALENBIS GOMEZ-PINTO, (processed)
EULER DeJESUS SOTO-GALLO (processed)

DATE : August 16, 1999

LOCATION : Fox Run Restaurant / Best Western, New Baltimore, NY

THING OF VALUE : Approximately 99 grams of heroin delivered.

COUNT 13

DEFENDANT(S) : **PEDRO GONZALEZ,**
INES CECILIA GUZMAN-RAMIREZ, (processed)
JOSE A. ESPEJO-LARA, (processed)
JUAN CARLOS ALVA-FLORES (processed) and
GLORIA NELLY ESCOBAR-RIOS (processed)

DATE : October 8, 1999

LOCATION : Fox Run Restaurant / Best Western, New Baltimore, NY

THING OF VALUE : Heroin promised

COUNT 14

DEFENDANT(S) : **PEDRO GONZALEZ,**
LUIS NORBERTO GOMEZ-RAMIREZ, (processed)
ROBERTO GOMEZ-PIEDRAHITA (processed) and
NAYID ENSUENO SOTO-GALLO (processed)

DATE : October 27, 1999

LOCATION : Christie's Grille / Best Western, Johnson City, NY

THING OF VALUE : Heroin promised.

COUNT 15

DEFENDANT(S) : **PEDRO GONZALEZ,**
SERGIO ALBERTO GALLEGOS-VASQUEZ (processed)
WILFRIDO WALTER VALENCIA-VELEZ (processed)

DATE : December 14, 1999

LOCATION : Ruby Tuesday Restaurant / Best Western, Johnson City, NY

THING OF VALUE : Heroin promised.

COUNT 16

DEFENDANT(S) : **PEDRO GONZALEZ**
ASCENSION GOMEZ-deAMAYA, (processed)
JOHN JAIRO CEBELLOS-MEJIA, (processed)
MIGUEL PABLO MILLAN-CASTILLO (processed) and
PABLO DEAN VILLA (processed)

DATE : February 25, 2000

LOCATION : Sharon's Place / Best Western, New Baltimore, NY

THING OF VALUE : Heroin promised

COUNT 17

DEFENDANT(S) : **PEDRO GONZALEZ,
BEATRIZ RIAL-IGLESIAS, (processed)
LUIS SAMPEDRO-MARTINEZ, (processed)
DIANA M. LIJO-GARCIA, (processed)
MEE JIN KIM, (processed)
JUAN RODRIGUEZ-FERNANDEZ, (processed) and
JOSE SANDE GONZALEZ, (processed)**

DATE : March 22, 2000

LOCATION : Fox Run Restaurant / Best Western, New Baltimore, NY

THING OF VALUE : Approximately one (1) kilogram of heroin delivered.

COUNT 18

DEFENDANT(S) : **PEDRO GONZALEZ,
AIDA AZUCENA NINO-TELLEZ, (processed),
IVANIA MARIA COUTO (processed),
ARACELIS MUÑOZ-SALDANA, (processed)
LUIS FERNANDO-YEPES-QUINTERO (processed)
a/k/a Joaquin Emilio Munoz-Munoz
OSCAR MAURICIO RAMIREZ-JARAMILLO (processed)
a/k/a Daniel Alberto Gonzalez-Sierra**

DATE : May 19, 2000

LOCATION : Fox Run Restaurant / Best Western, New Baltimore, NY

THING OF VALUE : Heroin delivered on March 22, 2000 and future heroin promised.

**ESTABLISHING A COMMERCIAL ENTERPRISE FOR PURPOSE
OF EVADING PROVISIONS OF IMMIGRATION LAWS**

COUNT 19

THE GRAND JURY FURTHER CHARGES:

That beginning on or about June 24, 1999, and continuing to the present date, in the State

and Northern District of New York, **PEDRO GONZALEZ**, the defendant herein, knowingly and intentionally established a commercial enterprise for the purpose of evading the provisions of the immigration laws relating to the classification of aliens as resident aliens.

In violation of Title 8, United States Code, Section 1325(d).

TRANSPORTATION OF ILLEGAL ALIEN

COUNTS 20 - 32

THE GRAND JURY FURTHER CHARGES:

That on or about the dates set forth below, at or near the following locations in the State and Northern District of New York, the defendant herein, listed below, knowing that aliens, namely the aliens listed below, had come to, entered and remained in the United States in violation of law, did transport and move, said aliens within the United States by means of transportation, namely by the vehicle listed below, in furtherance of such violation of law, each instance constituting a separate Count of this Indictment.

All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii) and (B) and Title 18, United States Code, Section 2.

COUNT 20

DEFENDANT : **PEDRO GONZALEZ**

DATE : June 24, 1999

LOCATION : Neptune Diner / Super 8 Motel, Oneonta, NY

ALIEN(S) : **PATRICIA BECCERA,
MARGARITA OSPINA**

VEHICLE : 1990 Chevy Lumina, NY Reg: W40-5WH

COUNT 21

DEFENDANT : **PEDRO GONZALEZ**

DATE : July 15, 1999

LOCATION : Fox Run Restaurant / Best Western, New Baltimore, NY

ALIEN(S) : **SANDRA E. GALLON,
ANASTASIO C. GUZMAN**

VEHICLE : 1990 Chevy Lumina, NY Reg: W40-5WH

COUNT 22

DEFENDANT : **PEDRO GONZALEZ**

DATE : August 11, 1999

LOCATION : Fox Run Restaurant / Best Western, New Baltimore, NY

ALIEN(S) : **HILDA MERCEDES CALLE-VERGARA,
OCTAVIO DeJESUS VILLA-CASTANO,
SANDY YURLEY RODRIGUEZ-CORTEZ,
LAUREANO HERNAN LASSO-GARCIA,
CESAR AUGUSTO GUZMAN-RAMIREZ,**

VEHICLE : 1999 Montana (van) NY Reg: U24-8XB

COUNT 23

DEFENDANT : **PEDRO GONZALEZ**

DATE : August 16, 1999

LOCATION : Fox Run Restaurant / Best Western, New Baltimore, NY

ALIEN(S) : **BLANCA ALICIA PINTO-OSORIO
ALFREDO ALBENIS GOMEZ-PINTO,
EULER DeJESUS SOTO-GALLO,
PATRICIA BECERRA-PINZON,
MARGARITA HERRERA-OSPINA**

VEHICLE : Rental van.

COUNT 24

DEFENDANT : **PEDRO GONZALEZ**

DATE : October 6, 1999

ALIENS : **BLANCA ALICIA PINTO-OSORIO, (issued I-551)
EULER DeJESUS SOTO-GALLO (issued I-551)
a/k/a Fantasma
CESAR AUGUSTO GUZMAN-RAMIREZ (issued I-551)
OCTAVIO DeJESUS VILLA-CASTANO (issued I-551)**

VEHICLE : 1992 Oldsmobile Regency, NY Reg.: BT6-34K
VIN: 1G3CX53LXN4330921

COUNT 25

DEFENDANT : **PEDRO GONZALEZ**

DATE : October 8, 1999

LOCATION : Fox Run Restaurant / Best Western, New Baltimore, NY

ALIEN(S) : **INES CECILIA GUZMAN-RAMIREZ,
JOSE ANTONIO ESPEJO-LARA,
JUAN CARLOS ALVA-FLORES,
GLORIA NELLY ESCOBAR-RIOS**

VEHICLE : 1999 Mitsubishi Montero, NY Reg: N76-0VL

COUNT 26

DEFENDANT : **PEDRO GONZALEZ**
DATE : October 15, 1999
LOCATION : Fox Run Restaurant / Best Western, Johnson City, NY
ALIEN(S) : **ALFREDO ALBENIS GOMEZ-PINTO,
a/k/a Javier,
SANDRA GALLON-CARDONA**
VEHICLE : 1995 Nissan Maxima, NY Reg: AT8-76Z; VIN:JN1CA21D3ST631059

COUNT 27

DEFENDANT : **PEDRO GONZALEZ**
DATE : October 27, 1999
LOCATION : Christie's Grille / Best Western, Johnson City, NY
ALIEN(S) : **LUIS NORBERTO GOMEZ-RAMIREZ,
ROBERTO GOMEZ-PIEDRAHITA
NAYID E. SOTO-GALLO**
VEHICLE : Rental vehicle.

COUNT 28

DEFENDANT : **PEDRO GONZALEZ**
DATE : December 14, 1999
LOCATION : Ruby Tuesday's / Best Western, Johnson City, NY
ALIEN(S) : **SERGIO A. GALLEJO-VASQUEZ,
WILFRIDO WALTER VALENCIA-VELEZ**
VEHICLE : 1998 Honda Accord, NY Reg: X10-7VR

COUNT 29

DEFENDANT : **PEDRO GONZALEZ**
DATE : February 25, 2000
LOCATION : Sharon's Place Restaurant / Best Western, New Baltimore, NY
ALIEN(S) : **ASCENSION GOMEZ-AMAYA,
JOHN JAIRO CEBALLOS-MEJA,
MIGUEL PABLO MILLAN-CASTILLO
PABLO DEAN-VILLA,
GLORIA NELLY ESCOBAR-RIOS**
VEHICLE : 2000 Dodge Suburban, NY Reg: CR8-29X (rental vehicle)

COUNT 30

DEFENDANT : **PEDRO GONZALEZ**
DATE : March 22, 2000
LOCATION : Fox Run Restaurant / Best Western, New Baltimore, NY
ALIEN(S) : **BEATRIZ RIAL-IGLESIAS,
LUIS SAMPEDRO-MARTINEZ,
DIANA MARIA LIJO-GARCIA,
MEE JIN KIM,
JUAN RODRIGUEZ-FERNANDEZ,
JOSE SANDE GONZALEZ,**
VEHICLE : 2000 Dodge Van, NY Reg: CS5-58H (rental vehicle)

COUNT 31

DEFENDANT : **PEDRO GONZALEZ**
DATE : April 7, 2000
LOCATION : Sharon's Place Restaurant / Best Western, New Baltimore, NY
ALIEN(S) : **WILFRIDO WALTER VALENCIA-VELEZ,
JUAN C. ALVA-FLORES**
VEHICLE : 1995 Tan Buick, NY Reg: DN5-35N; VIN: 1G4AG55M9S6469513

COUNT 32

DEFENDANT : **PEDRO GONZALEZ**
DATE : May 19, 2000
LOCATION : Fox Run Restaurant / Best Western, New Baltimore, NY
ALIEN(S) : **AIDA AZUCENA NINO-TELLEZ**, (processed),
IVANIA MARIA COUTO (processed),
ARACELIS MUÑOZ-SALDANA, (processed),
LUIS FERNANDO-YEPES-QUINTERO (processed)
a/k/a **Joaquin Emilio Munoz-Munoz**
OSCAR MAURICIO RAMIREZ-JARAMILLO (processed)
a/k/a **Daniel Alberto Gonzalez-Sierra**
VEHICLE : 1990 Dodge Van, NY Reg: AJ6-90S

RE-ENTRY OF A PREVIOUSLY DEPORTED ALIEN

COUNT 33

THE GRAND JURY FURTHER CHARGES:

That on or about May 19, 2000, in the State and Northern District of New York, **LUIS**

FERNANDO YEPES-QUINTERO, a/k/a Joaquin Emilio Munoz-Munoz, the defendant herein, an alien who had previously been arrested and deported on or about July 10, 1990, knowingly and unlawfully was found in the United States, the said defendant having not obtained the consent of the Attorney General of the United States for reapplication by the defendant for admission into the United States.

In violation of Title 8, United States Code, Sections 1326(a) and (b)(2).

COUNT 34

THE GRAND JURY FURTHER CHARGES:

That on or about May 19, 2000, in the State and Northern District of New York, **LUIS OSCAR MAURICIO RAMIREZ-JARAMILLO, a/k/a Daniel Gonzalez-Sierra**, the defendant herein, an alien who had previously been arrested and deported on or about 1997, knowingly and unlawfully was found in the United States, the said defendant having not obtained the consent of the Attorney General of the United States for reapplication by the defendant for admission into the United States.

In violation of Title 8, United States Code, Sections 1326(a) and (b)(2).

FORFEITURE ALLEGATIONS

In committing the violations of Title 21, United States Code, as alleged above, and in committing the violations of subsection (a) of Title 8, United States Code, Section 1324, as alleged above, the following conveyances were used on the following dates to commit, or to facilitate the commission of said violations, and are therefore subject to seizure and forfeiture:

<u>Date Used</u>	<u>Vehicle & License Plate</u>	<u>Violation</u>
10/15/99	1995 Nissan Maxima NY Reg: AT8-76Z VIN: JN1CA21D3ST631059	8 USC § 1324(a)
04/07/00	1995 Buick Century NY Reg: DNS-35N VIN: 1G4AG55M9S6469513	"

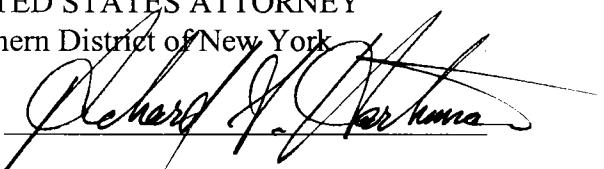
In violation of Title 21, United States Code, Section 853(a) and Title 8, United States Code, Section 1324(b).

A TRUE BILL



FOREPERSON OF THE GRAND JURY

DANIEL J. FRENCH
UNITED STATES ATTORNEY
Northern District of New York

BY: 

RICHARD S. HARTUNIAN
ASSISTANT U.S. ATTORNEY
Bar Roll No.: 301383